



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

December 1, 2016

Peter P. Brussock, Ph.D.
The ELM Group, Inc.
4920 York Road, Suite 290
P.O. Box 306
Holicong, PA 18928-0306

Re: Berry's Creek Study Area
Remedial Investigation/Feasibility Study Work Plan Addendum Comments

Dear Dr. Brussock:

The United States Environmental Protection Agency (EPA) has reviewed the Remedial Investigation/Feasibility Study Work Plan Addendum for the Berry's Creek Study Area (BCSA), dated September 2016. The work plan addendum was submitted in response to EPA's June 13, 2016 letter. The updated work plan describes the phased approach for the BCSA remediation, starting with a source control action for Upper and Middle Berry's Creek waterway sediments.

Overall, the document does an excellent job of expanding upon the conceptual approach for conducting the phased remediation effort for the site, and outlining how these concepts will be developed into a Feasibility Study. The work plan provides an acceptable approach to proceeding with the Feasibility Study development effort, but EPA has the following minor comments that should be addressed prior to final approval of the document:

1. A copy of EPA's June 13, 2016 letter should be included within the Work Plan Addendum.
2. Page 1-2, WP Addendum-1. BCSA Study Segments Figure: This graphic should highlight the open water areas of the creek, canal and the major tributaries.
3. Page 1-3, Section 1.3WP Addedum-2: Illustration of RI/FS and Multi-Phase Remedy Process: The phased remedy approach is graphically illustrated in this schematic. The schematic is helpful in presenting the overall concept of the phased remedy approach. No changes are necessary for the RI/FS Work Plan Addendum. This schematic may need adjustment to be used as a community interaction tool for future outreach efforts. EPA will discuss refinements with the group in preparation of an update to the Community Interaction Plan.

4. Section 1.3, Multi-Phase Remedy Process: Please clarify whether risk will be evaluated for each phase by incorporating new data as it becomes available, or whether the initial risk assessment will serve to inform all future phases of the remedy.
5. Page 2-2, Second Complete Bullet: Please add a cross-reference to the RI Report with respect to more information on the fluff layer. In addition, it should be clarified in the RI Report that given the large uncertainties associated with direct sampling of the fluff layer, such sampling was not attempted.
6. Page 2-3, Section 2.0, First Paragraph: The term "breakpoint" is not used in the RI Report, nor Appendix G (which is the cross-reference presented in on page 2-3 of the RI/FS Work Plan Addendum). Please provide more data and rationale on how the "breakpoint" was selected.
7. Page 4-1, Section 4.1, Bottom Paragraph: Please provide more information on how the Marsh Demonstration Project will differ from the previous marsh pilot studies.

If you have any questions, please feel free to call me at 212-637-3956 or email at tomchuk.doug@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Douglas J. Tomchuk". The signature is written in a cursive style with a large, stylized 'D' and 'T'.

Douglas J. Tomchuk
Remedial Project Manager
Central New Jersey Remediation Section